Knott and Annie M. Knott his wife complaining say;

- That the said Annie M. Knott by her deed dated December 28th A.P. 1908 did convey to her husband the said Alexander Knott, Trustee for the children of the said Annie M. and Alexander Knott, a parcel of land containing 17 acres and 14 perches of land, more or less, situated in Emmitsburg District in Frederick County in the State of Maryland, upon the trusts and for the purposes set out in the said deed as follows; "That he the said Alexander Knott. Trustee as aforesaid, shall possess and centrel said lot of land until the youngest child born unto the said Alexxander and Annie M. Knott shall arive at the age of twenty one years when said tract of land shall become the absolute property of said children, or those of them living, as tenants in common subject to a life-tenancy of my said husband. Alexander Knott, said life Tenancy only to begin when the trust hereby created shall terminate, but if my said husband desires to do so he shall have the right to set apart for or convey unto any of our said Children such part or share of said land, as he consideres the just share of such Child, or children, at any time after such child shall become 21 years of age, reserving then for himself a life-tenancy in such share if he sesires to do so, it being my intention that my husband shall have full and absolute control of said property until the youngest child born to me and my said husband, A exander Knott, shall arriv at the age of 21 years, to use in such manner as in his judgment deems best, for the benefit of our said children;" as will appear by reference to the said deed, which is recorded in Liber H.W.B.No.298, folio 111, one of the Land Records of Frederick County, and a certified copy whereof is filed herewith, Marked Exhibit No. 1, and which, together with all other Exhibits herewith filed is prayed to be taken and considered as part of this bill of Complaint.
- That the said Alexander Knott and Annie M. Knott are well advanced in age and their only children are the said Mary L. Knott, Guy A. Knott, Gerald Knott, Veronica Knott, Austin Knott, Alphonso Knott and Donald Knott, who are all adults except the said Austin Knott, Alphonso Knott and Donald Knott, who are infants under the age of twenty-one years; and the said seven children are the equitable owners as tenants in common of the said land, each having an undivided one-seventh share or interest therein, subject to whatever beneficial rights or interest therein the said Alexander Knott has under and by virtue of the said deed.
- That by an agreement dated February 18th A.D.1921 your Orators and Oratrices contracted in writing with James J.Mackenzie and Laura T.Mackenzie, his wife, to sell to the seid James J.Mackenzie and Laura T.Mackenzie a portion of the said land containing 3 Acres, 2 Roods and 18 square perches of land, the said agreement being subject to the ratification and confirmation of the Circuit Court for Frederick County, Maryland, in Equity, upon appropriate proceedings therein had to that end, which said proceedings your Orator and Oratrices did agree and obligate themselves to institute and carry through without unnecessary delay, the said purchasers agreeting to pay as consideration for the said land the sum of Two Hundred Dollars and further to pay the Court costs of the said proceedings; the land so sold and purchased being described by metes and bounds courses and distances in the said contract, which is herewith filed as part hereof, Marked Exhibit No.2.
- thereof, and the said land is vacant and unoccupied and not productive of any income to the owners thereof, and the said sum of Two Hundred Dollars is a fair and reasonable price for the land contracted to be sold and purchased, as aforesaid, and as much as your Orator and Oratrices could reasonably expect to obtain for the same, and the said land cannot be divided without loss or injury to the parties interested and it would be for the interest and advantage of the parties interested therein, both the infants as well as the adults and advantageous to the parties concerned, for said contract of sale, Exhibit No. 2, to be confirmed by your Honorable Court, and the proceeds of sale divided among the parties entitled thereto according to their respective rights, or disposed of under of under the order and direction of your Honorable Court in accordance with the respective rights and interest of the parties hereto.
- 5. That all of the parties to this Bill of Complaint are adults except the said Defendants, Austin Knott, Alphonso Knott and Donald Knott, who are infants under the age of twenty-one years, and the said inafants reside in Frederick County in the State of Maryland.